

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ORIGINAL

Name and address of Plaintiff:

Jennifer Ann Fedoruk
Venango County Prison
Franklin Pa 16323

v.

CA05-186E

Full name, title, and business address
of each defendant in this action:

1 Ronald Snyder, Warden
Venango County Prison
Franklin Pa 16323

2 Keoke Craft, C.O.
Venango County Prison
Franklin Pa 16323

Use additional sheets, if necessary
Number each defendant.

RECEIVED

JUN 15 2005

Plaintiff brings this action against the above named and identified defendants on the following cause of action:

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

I. Where are you now confined? Venango County Prison

What sentence are you serving? unknown

What court imposed the sentence? Venango County

II. Previous Lawsuits

A. Describe any and all lawsuits in which you are a plaintiff which deal with the same facts involved in this action. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county) and docket number

3. Name of judge to whom case was assigned _____
4. Disposition (For example: Was the case dismissed? Was it appealed? Is it still pending?)

5. Approximate date of filing lawsuit _____
6. Approximate date of disposition _____

B. Prior disciplinary proceedings which deal with the same facts involved in this action:

Where? _____
When? _____
Result: _____

III. What federal law do you claim was violated? _____
8th & 14th Amendments

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.)

- A. Date of event: May 14, 2005
- B. Place of event: Venango County Prison
- C. Persons involved--name each person and tell what that person did to you:
- 1) Ronald Snyder, Warden - agreed upon the standards of my living situation & did not enforce any consistency in the rules & regulations.
- 2) Kenye Craft, CO - used unnecessary force & created her own procedure in the prison.
- See Attachment

I, Jennifer A. Foreck, have been placed in segregation in the Venango County Prison. I was not given any reason for this. I have since been placed on medication for depression. I have endured many inconsistencies in procedure due to the segregation. I believe CO Keoke Craft used unnecessary force as a result of this. She escorted me to a visit on 5/14/05. She placed handcuffs on me which I'd never worn to visit from this segregated area. An argument ensued & I was told to discuss the matter with the OIC, Doug Buchanan. On route to visitation, I ran into the OIC. I was discussing the inconsistency with Buchanan as Craft was shouting for me to enter the elevator. I was then returned to the segregation area which is located at the receiving desk of the Prison. Buchanan advised me to continue wearing the cuffs in exchange for my visit. It was agreed upon & I requested another CO take me to my visit. Buchanan denied my request. Craft & I then again proceeded to my visit. Upon entering the elevator, Craft began to argue with me. I told her not to speak with me. She continued shouting & yanking my cuffs. Craft radioed for backup. I endlessly shouted that I wasn't doing anything. CO Matt Mason arrived at the elevator. I was escorted back to the receiving desk. I told Craft not to touch me as she pinched the back of my arm. She threw me into the receiving desk & I repeated that I had done nothing wrong. I was placed in my cell with the cuffs still on. Craft denied my visit & said she'd remove the cuffs when she felt like it. CO Bill Struthers witnessed this & came to remove the cuffs along with Mason. Inmate Sheila Kizer witnessed both returns to my cell. Inmate Kizer, CO Struthers, & Mason clearly saw swelling & bruises on my wrists. Buchanan came to my cell & asked what happened as Struthers & Mason listened. The Venango County Sheriff's office was contacted. Deputy O'Neil took pictures & statements. I was also granted a grievance on the following shift. I have since lost even more privileges. I am segregated where only males work yet have been instructed not to speak to me. The rules change to whatever & whenever they want them to. I believe that if there wasn't such inconsistency in rules that these turn of events would not have occurred. No other female has been segregated like I have nor been subject to this mistreatment.

- V. Did the incident of which you complain occur in an institution or place of custody in this District?
If so, where? Venango County Prison

and answer the following questions:

- A. Is there a prisoner grievance procedure in this institution?
Yes ☒ No ☐
- B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?
Yes ☒ No ☐
- C. If your answer is YES,
1. What steps did you take? I filled out an Inmate Request to file a grievance, received it & proceeded to file it.
 2. What was the result? I received a verbal & written grievance response indicating it would be looked into & any action taken is a private concern.
- D. If your answer is NO, explain why not: _____
- E. If there is no prison grievance procedure in the institution, did you complain to prison authorities?
Yes ☐ No ☐
- F. If your answer is YES,
1. What steps did you take? _____
 2. What was the result? _____

VI. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I would like to be compensated for malice & indifferent acts in a settlement in the amount of \$160,000.00

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

6/11/05
(Date)

Jennifer Ann Fedorak
(Signature of Plaintiff)

Perry Square Station
Erie, Pennsylvania
165011151

4125460004-0098

06/15/2005

(814)453-6433

09:40:43 AM

| Sales Receipt | | | |
|---------------|------|-------|-------|
| Product | Sale | Unit | Final |
| Description | Qty | Price | Price |

Mail Pickup Delivered

Label # 70050390000399390038

of Mail Pieces : 1

Mail Pickup Date: 06/15/2005 09:40 AM

Total: \$0.00

Paid by:

Bill#: 1000200343209

Clerk: 01

All sales final on stamps and postage.

Refunds for guaranteed services only.

Thank you for your business.

Customer Copy